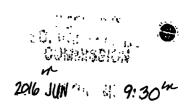


FEDERAL ELECTION COMMISSION Washington, DC 20463



SENSITIVE

MEMORANDUM

TO:

2

3

5

6

7

8.

9

10 11 12

13

14

15 16

17 18

19

20 21

22 23

24

25 · 26

27

28

The Commission

FROM:

Kathleen Guith

Acting Associate General Counsel for Enforcement

Stephen A. Gura 48

Deputy Associate General Counsel for Enforcement

BY:

Mark Allen

Assistant General Counsel

Delbert K. Rigsby DKR

Attorney

SUBJECT:

MURs 6978 and 7054 (Oakland County Democratic Party) - Pre-Probable Cause

Conciliation Agreement

In MUR 6978, the Commission found reason to believe that Oakland County Democratic Party ("Committee") violated 52 U.S.C. §§ 30102(c), 30102(h)(1) and 30104(b), and 11 C.F.R. § 106.7(d)(1), and approved a conciliation agreement

). In MUR 7054, the Commission found reason to believe that the Committee violated 52 U.S.C. § 30104(b), and approved a conciliation agreement

.² In the First General Counsel's Report for MUR 7054, we informed the Commission that we intended to honor the Committee's request to negotiate a single conciliation agreement covering both matters.³

See Amended Certification in MUR 6978 (November 23, 2015).

See Certification in MUR 7054 (April 28, 2016).

See First General Counsel's Report in MUR 7054 at 7, 8.

2

3

5 6

7 ·

8

10

11

12 13

We recommend that the Commission accept the signed conciliation agreement with the Committee and close the files in MUR 6978 and MUR 7054.

RECOMMENDATIONS:

- 1. Accept the attached conciliation agreement with Oakland County Democratic Party and Phillip W. Reid in his official capacity as treasurer.
- 2. Approve the appropriate letter:
- 3. Close the file in MUR 6978
- 4. Close the file in MUR 7054.